

FREEMAN, NOOTER & GINSBERG
ATTORNEYS AT LAW

LOUIS M. FREEMAN
THOMAS H. NOOTER*
LEE A. GINSBERG

CHARLENE RAMOS
OFFICE MANAGER

75 MAIDEN LANE
SUITE 503
NEW YORK, N.Y. 10038

(212) 608-0808
TELECOPIER (212) 962-9696

July 11, 2012

BY ECF

Honorable Kiyo A. Matsumoto
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Russo (Frank Senatore)
11 Cr. 30 (KAM)

Dear Judge Matsumoto:

The sentencing for my client, Frank Senatore, is currently scheduled for Tuesday, August 7th at 10:00 a.m. When the original sentencing proceeding was adjourned to that date I did not realize that I would be on vacation with my family from August 4th until August 12th. As I do not want to unduly delay the sentencing proceeding and I also understand the court's busy schedule, I propose either moving the sentence date up to the week of July 30th when I am available except for July 31st from 2 p.m. to 4 p.m. when I am appearing before Judge Mauskopf and on August 1st from 10 a.m. until 1 p.m. when I have a hearing in the Southern District. I can also be available the week of August 13th, particularly 2 p.m. or thereafter on August 14th, anytime until 3 p.m. on August 15th and all day on August 16th. I have spoken with AUSA Gina Parlovecchio and she consents to this request.

Thank you for your consideration of this request.

Respectfully,


Lee Ginsberg

cc: Gina Parlovecchio, Esq. (By ECF)